

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

INSTITUTO DE EDUCACION
UNIVERSAL, et al,

Plaintiffs

v.

UNITED STATES DEPARTMENT OF
EDUCATION, et al.,

Defendants

CIVIL NO. 98-2225 (RLA)

**MOTION REQUESTING LEAVE
TO WITHDRAW AS LEGAL REPRESENTATIVES**

TO THE HONORABLE COURT:

COMES NOW Plaintiff Instituto de Educación Universal (“IEU”) through its counsel of record, and very respectfully allege and prays:

1. In 2001, the undersigned was contacted by plaintiff Angel Ruiz-Rivera, in representation of IEU, to represent it in the captioned case. On October 26, 2004, the court entered judgment against IEU, and we so notified plaintiff, along with the opinion and order of even date.

2. IEU and Mr. Rivera wish to engage new counsel for further proceedings, since there are currently substantial fees for services outstanding, and the undersigned is not available to continue with the representation under such circumstances.

3. We have advised plaintiffs that since IEU has made a claim against the U.S. Government, IEU has a 60 day period within which to file a notice of appeal with the District Court Clerk, starting on the day after entry of judgment, and expiring on December 25, 2004.

[Fed. R. App. Proc., Rule 4(a)(1)(B)].

4. IEU therefor has sufficient time to engage new counsel of its choosing before any appellate timetable expires.

5. Further, IEU may wish to submit other requests for remedies before the Honorable Court, for which purposes the Court is respectfully requested to grant IEU 30 days, from the date of entry of judgment, i.e., until November 25, 2004, to obtain new counsel and present an appearance before the Court.

WHEREFORE, after consultation with our clients, we respectfully request that the undersigned and the Schuster Usera & Aguiló LLP Firm be allowed to withdraw as legal representatives for the plaintiff, and that IEU be granted 30 days from the entry of judgment, to expire on November 25, 2004, to engage new counsel.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 5th day of November, 2004.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system: Isabel Muñoz-Acosta, Esq., isabel.munoz@usdoj.gov U.S. Attorney's Office District of Puerto Rico, Civil Division, Room 452, Federal Building, Carlos Chardón Ave., Hato Rey, PR 00918 and Luis Rodríguez, luis.rodriguez3@usdoj.gov, as well as to Mr. Angel Ruiz- Rivera, at ARUIZRIVERA@aol.com. Parties may access this filing through the Court's system.

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